

# LAND USE SERVICES DEPARTMENT

## ADMINISTRATION

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COUNTY OF SAN BERNARDINO  
PUBLIC AND SUPPORT  
SERVICES GROUP

JULIE RYNERSON ROCK  
Director

August 25, 2009

Christopher Calfee, Special Counsel  
ATTN: CEQA Guidelines  
California Resources Agency  
1017 L Street, #2223  
Sacramento, CA 95814

### Re: NOTICE OF PROPOSED AMENDMENT OF REGULATIONS IMPLEMENTING THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Dear Mr. Calfee:

The County of San Bernardino (County) appreciates the opportunity to provide comments on the proposal by the California Natural Resources Agency to adopt and amend regulations implementing Division 13 of the Public Resources Code, the California Environmental Quality Act (CEQA), for the mitigation of greenhouse gas emissions and the effects of greenhouse gas emissions. County has previously provided comments to the Office of Planning and Research and welcomes most of the proposed changes. However, per our previous comment, we request clarification on the following issue:

#### **CEQA Guidelines: Appendix G, Environmental Checklist Form**

##### Agriculture and Forest Resources

The County is concerned that assessing significant impacts may be difficult, if not impossible, if the Department of Forestry and Fire Protection have not compiled sufficient quantifiable data to assist each local agency in assessing significant impacts. Also, it is not clear whether forest service / private land exchanges require determining impacts to forest resources as identified in this section.

In addition, Item II (d) reads, "*Result in the loss of forest land or conversion of forest land to non-forest use?*" and the added language in item II (e) reads, "*...or conversion of forest land to non-forest use?*" Please clarify how these two items are different and / or add an example of each.

Thank you for the continued opportunity to play an active role in this process. Should you have any questions or need additional information, please do not hesitate to call me at (909)387-4141 or Jim Squire at (909)387-0236 or via email: [jsquire@sbcounty.gov](mailto:jsquire@sbcounty.gov).

Sincerely,

Julie Rynerson Rock, AICP, Director  
County of San Bernardino  
Land Use Services Department

MARK H. UFFER  
County Administrative Officer

NORMAN A. KANOLD  
Assistant County Administrator  
Public and Support  
Services Group

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